



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

217/785-9407

Refer to: L1630200005 -- St. Clair County  
Sauget Area 1 Sites - Sauget  
Superfund/Technical Reports

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**RECEIVED**  
AUG 04 1998

**SUPERFUND DIVISION  
OFFICE OF THE DIRECTOR**

July 28, 1998

Mr. William E. Muno  
Director, Superfund Division  
U.S. EPA Region 5, S-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Dear Mr. Muno:

As you are well aware, Illinois EPA has been involved in formal negotiations with the Monsanto Company and Solutia, Inc. ("Solutia") for the performance of an RI/FS at the Sauget Area 1 Site ("Site") since October of 1996. These negotiations represent an extension of discussions with the Monsanto Company and other Sauget PRPs, that were initiated by my agency in 1989 after it became evident that there would be long delays in the State's proposal for NPL listing. There had been many proposals and counterproposals that have gone back and forth between Monsanto/Solutia and Illinois EPA since the 1996 negotiations were initiated, but there was virtually no mutual agreement on Illinois EPA's primary goal - the performance of an RI/FS under an enforceable agreement. This letter is being written to formally refer the Sauget Area 1 Site to U.S. EPA since it was not possible to obtain the necessary agreements outlined in your March 10, 1998 letter. Illinois EPA's director, Mary Gade has in fact already informed Solutia in writing that the Site will be referred to U.S. EPA and that Solutia's offer to perform remediation at a portion of the Site will not be reviewed by Illinois EPA.

Monsanto's first proposal to perform a site investigation within Illinois EPA's Site Remediation Program was rejected on May 2, 1997. An alternate proposal for limited sampling in Dead Creek followed by a capping action at Dead Creek was rejected on October 22, 1997. Illinois EPA, on behalf of the State, submitted a Statement of Work in November of 1997 and a draft RI/FS consent decree in early 1998 for Solutia's review and comment. Solutia would not accept Illinois EPA's and U.S. EPA's position that an RI/FS bound by a consent decree be performed at the Site and instead requested further justification of Illinois EPA's position on their failed proposals. My staff and the Illinois Attorney General's Office had made every effort possible to facilitate a response from Solutia on the decree, however it became evident after reviewing Solutia's June 12, 1998 letter to Director Gade that an acceptable agreement would not be reached.

Over the course of U.S. EPA's upcoming negotiations with Solutia and other PRPs at the Site, Illinois EPA is hopeful that an agreement on an RI/FS or EE/CA will be reached. In the event that this agreement cannot be reached, Illinois EPA stands willing to assume the technical lead for any fund-lead investigatory work leading to a final remedy at the Site.

If we can assist you in any way at this site, please do not hesitate to contact us.

Yours Truly,

A handwritten signature in black ink that reads "William C. Child". The signature is written in a cursive, slightly stylized font.

William C. Child, Chief  
Bureau of Land

cc: James L. Morgan, Illinois Attorney General's Office